

**IN THE  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

CHAMBER OF COMMERCE OF  
THE UNITED STATES OF  
AMERICA, et al.,

*Plaintiffs,*

v.

PETER FRANCHOT,

*Defendant.*

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No. 21-cv-410-DKC

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**CONSENT MOTION FOR EXTENSION OF TIME  
AND FOR LEAVE TO FILE JOINT STATUS REPORT**

Defendant Peter Franchot, Comptroller of the State of Maryland, requests a 14-day extension of the time for filing a response to the complaint, because plaintiffs have represented that recent legislative developments necessitate the filing of an amended complaint.

1. The current due date for filing a response is April 16, 2021.
2. As defendant informed the Court in his previous motion for extension of time filed on March 5, 2021, ECF 19, at that time the General Assembly was considering legislation (Senate Bill 787 and House Bill 1200) that, if passed, would make material amendments to the statute challenged in the complaint.
3. On April 12, 2021, the General Assembly enacted Senate Bill 787.
4. Plaintiffs have informed defendant that they intend to file an amended

complaint to account for the passage of Senate Bill 787 and the changes it has made to the challenged statute.

5. Defendant requests a 14-day extension of the time, to and including April 30, 2021, to file a response to the original complaint, to give the parties an opportunity to confer and arrive at a proposed schedule for the filing of an amended complaint and the filing and briefing of dispositive motions with respect to the amended complaint.

6. Defendant also requests leave for the parties to file on or before April 30, 2021, a joint status report setting forth the parties' proposed schedule.

7. Plaintiffs have authorized undersigned counsel to state that they consent to the requested extension and the request for leave for the parties to file a joint status report.

WHEREFORE, the defendant requests that the Court extend the time for filing of a response to the complaint to April 30, 2021, and grant leave for the parties to file on or before April 30, 2021, a status report proposing a litigation schedule.

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

/s/ Steven M. Sullivan

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April 14, 2021

Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I certify that, on this 14th day of April, 2021 the foregoing motion and a proposed order were served by CM/ECF on the following:

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/s/ Steven M. Sullivan

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